

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,	§	
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
COMMSCOPE HOLDING COMPANY,	§	
INC., COMMSCOPE INC., ARRIS	§	
INTERNATIONAL LIMITED, ARRIS	§	
GLOBAL LTD., ARRIS US HOLDINGS,	§	Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§	(Lead Case)
TECHNOLOGY, INC., and ARRIS	§	
ENTERPRISES, LLC,	§	
	§	
NOKIA CORP., NOKIA SOLUTIONS	§	
AND NETWORKS OY, and NOKIA OF	§	Civil Action No. 2:21-cv-309-JRG
AMERICA CORP.	§	(Member Case)
	§	
Defendants.	§	

**TQ DELTA, LLC’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO THE COMMSCOPE DEFENDANTS’ MOTION TO TRANSFER VENUE
TO THE DISTRICT OF DELAWARE**

Now comes, Plaintiff TQ Delta, LLC (“TQ Delta”) and respectfully moves for a two-week extension of time, up to and including December 10, 2021, to respond to Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC’s (“CommScope”) Motion to Transfer Venue to the District of Delaware (“Motion”). Dkt. No. 32. In support of its Motion, TQ Delta would respectfully show the Court as follows:

CommScope filed its Motion on November 11, 2021. Under Local Rule CV-7(e), the deadline to respond to this Motion was placed on Thanksgiving, November 25, 2021. As this is a legal holiday, TQ Delta's current response deadline is November 26, 2021. *See* FED. R. CIV. P. 6(a). TQ Delta respectfully requests that this deadline be extended fourteen (14) days to December 10, 2021.

TQ Delta seeks this extension not for delay but for good cause and so that justice may be served. Further, TQ Delta requests this extension to allow time to meet and confer with CommScope regarding whether and to what extent discovery will be required to fully respond to CommScope's Motion. TQ Delta anticipates reaching an agreement with CommScope as to whether and to what extent discovery will be necessary for TQ Delta's response and will further move to extend the deadline to respond to CommScope's Motion to allow for that discovery, if any, to occur. TQ Delta has met and conferred with CommScope, and CommScope does not oppose the relief requested in this Motion.

Plaintiff TQ Delta respectfully requests that the Court extend the deadline for it to respond to CommScope's Motion by two additional weeks, up to and including December 10, 2021.

Dated: November 18, 2021

Respectfully submitted,

By: /s/ William E. Davis, III
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ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this November 18, 2021, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/William E. Davis, III
William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the CommScope Defendants are unopposed to this motion.

/s/William E. Davis, III
William E. Davis, III